

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: _____ :
: CHAPTER: 11
: CASE NO.: _____
: JUDGE: _____
DEBTOR. _____ :

**APPLICATION FOR EXPEDITED CONSIDERATION
OF FIRST DAY MATTERS**

On _____, _____ filed a
petition for relief under Chapter 11 of the Bankruptcy Code.

Counsel for the Debtor requests that the following relief be provided on a first day basis
(check those that apply):

1. _____ MOTION SEEKING THE JOINT ADMINISTRATION OF MULTIPLE DEBTOR
BANKRUPTCY CASES.
2. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR AN EXTENSION
OF TIME WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES.
3. _____ MOTION FOR AN ORDER AUTHORIZING THE EMERGENCY OR INTERIM
USE OF CASH COLLATERAL OR DEBTOR-IN-POSSESSION FINANCING
PENDING THE NOTICING AND SCHEDULING OF AN INTERIM OR FINAL
HEARING FOR FINANCING PURSUANT TO BANKRUPTCY CODE §§ 363
AND 364 AND FED. R. BANKR. P. 4001.
4. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN
EXISTING BANK ACCOUNTS AND BUSINESS FORMS AND CASH
MANAGEMENT PROCEDURES PROVIDING THE UNITED STATES
TRUSTEE'S OFFICE WITH A 60 DAY PERIOD TO OBJECT TO SAID ORDER
BEFORE IT BECOMES A FINAL ORDER.
5. _____ MOTION FOR AN ORDER AUTHORIZING A DEBTOR TO MODIFY THE
INVESTMENT GUIDELINES SET FORTH IN BANKRUPTCY CODE § 345 ON
AN INTERIM BASIS, PROVIDING THE UNITED STATES TRUSTEE'S
OFFICE AND ANY OTHER PARTIES-IN-INTEREST A 60-DAY PERIOD TO
OBJECT TO SAID ORDER BEFORE IT BECOME A FINAL ORDER.

6. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION WAGES, SALARIES, COMPENSATION, EMPLOYEE BENEFITS AND REIMBURSABLE BUSINESS EXPENSES UP TO THE LIMITS SET FORTH IN BANKRUPTCY CODE § 507(a).
7. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION SALES, USE, PAYROLL AND OTHER TAXES THAT ARE OTHERWISE PRIORITY CLAIMS UNDER BANKRUPTCY CODE § 507.
8. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE CREDIT CARD FACILITIES.
9. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO HONOR CERTAIN PRE-PETITION CUSTOMER OBLIGATIONS, DEPOSITS, REBATES, ETC.
10. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING AMOUNTS DUE ON VARIOUS INSURANCE POLICIES.
11. _____ MOTION FOR AN ORDER AUTHORIZING PAYMENT OF OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN VENDORS WHO PROVIDE CRITICAL AND NECESSARY SERVICES AND/OR PRODUCTS TO THE DEBTOR.
12. _____ MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY CODE § 366 REGARDING ADEQUATE ASSURANCE FOR THE FUTURE PERFORMANCE FOR UTILITIES AND ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE.
13. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO RETAIN A CLAIMS AND NOTICING AGENT.
14. _____ MOTION FOR AN ORDER ESTABLISHING NOTICING PROCEDURES.

15. _____ OTHERS [COUNSEL SHOULD ADD ALL OTHER MOTIONS FOR WHICH IT SEEKS CONSIDERATION AS A FIRST DAY MATTER.]

_____, 200_____

Name

Address

Telephone and Fax numbers

E-mail Address

NOTE: Each motion or application for which expedited consideration is requested shall be filed with the Clerk of the U.S. Bankruptcy Court For The District Of New Jersey and served upon the United States Trustee and all affected parties.